

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **CRIMINAL NO. 11-_____**
v. : **DATE FILED:_____**
ANGELA L. LIPSEY : **VIOLATIONS:**
: **18 U.S.C. § 1344 (bank fraud - 1 count)**
: **18 U.S.C. § 1028(A) (aggravated identity**
: **theft- 2 counts)**
: **18 U.S.C. § 2 (aiding and abetting)**

I N D I C T M E N T

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times relevant to this indictment:

1. Defendant ANGELA L. LIPSEY, was employed by Commerce Bank, now known as TD Bank, as a Customer Service Representative (“CSR”). As a CSR, LIPSEY serviced customer accounts and had access to customer account information.

2. Commerce Bank was a financial institution with accounts insured by the Federal Deposit Insurance Corporation, certificate number 25293-0.

3. Between on or about October 12, 2007, and on or about December 19, 2007, in the Eastern District of Pennsylvania and elsewhere, defendant

ANGELA L. LIPSEY

knowingly executed and attempted to execute, and aided and abetted the execution of, a scheme

to defraud Commerce Bank and to obtain money owned by and under the custody and control of Commerce Bank by means of false and fraudulent pretenses, representations and promises.

THE SCHEME

4. It was a part of the scheme that defendant ANGELA L. LIPSEY used her position as a CSR to secure information from Commerce Bank databases regarding multiple individual customer accounts, including the identities of customers, customer driver's license numbers, account numbers and account balances.

5. At the request of an individual identified here as J.H., whose identity is known to the grand jury, defendant ANGELA L. LIPSEY provided to J.H. the Commerce Bank customer information that she had obtained.

6. J.H. used the customer account information supplied by defendant ANGELA L. LIPSEY to manufacture or cause others to manufacture false photographic identification documents and fraudulent checks, and provided those false identification documents, and fraudulent checks to "check runners," persons unknown to the grand jury who cashed and attempted to cash fraudulent checks on, and made or attempted to make fraudulent withdrawals from, those Commerce Bank accounts.

7. From on or about October 12, 2007 until on or about December 19, 2007, defendant ANGELA L. LIPSEY used her position with Commerce Bank to improperly acquire account information for Commerce Bank accounts belonging to C.J., J.K., and K.R. LLC. Defendant LIPSEY then gave that account information, including account numbers, to J.H., who used the account information to acquire approximately \$31,300 from Commerce Bank by causing others unknown to the grand jury to cash fraudulent checks on and attempt to cash

fraudulent checks on, and make and attempt to make fraudulent withdrawals from, accounts belonging to C.J., J.K., and K.R. LLC.

In violation of Title 18, United States Code, Sections 1344 and 2.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about December 7, 2007 and on or about December 19, 2007, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

ANGELA L. LIPSEY

knowingly and without lawful authority transferred, possessed and used, and aided and abetted the possession and use of, a means of identification of another person, that is, the name, bank account number, and drivers license number, of an individual identified here as C.J. during and in relation to a bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about December 15, 2007 and on or about December 19, 2007, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

ANGELA L. LIPSEY

knowingly and without lawful authority transferred, possessed and used, and aided and abetted the possession and use of, a means of identification of another person, that is, the name, bank account number, and drivers license number of an individual identified here as J.K. during and in relation to a bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

A TRUE BILL:

FOREPERSON

ZANE DAVID MEMEGER
United States Attorney